

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
SAM BHAMBHANI and)
MAXIM TESLENKO,)
Defendants.)
Criminal No. 24-cr-10270-RGS

JOINT STATUS MEMORANDUM

The United States of America, with the assent of the defendant, Sam Bhambhani, hereby submits this memorandum addressing Local Rule 116.5(b). The parties have reviewed this memorandum and agree to its contents.

In light of this memorandum, the parties respectfully ask that the December 18, 2024 interim status conference be cancelled, and that the Court schedule an interim status conference at a time convenient for the Court in approximately 60 days

I. Automatic Discovery and Pending Discovery Requests.

The government has produced automatic discovery to the defendant, who is in the process of reviewing that discovery.

II. Timing of Additional Discovery to be Produced.

The government will provide discovery in response to any future request(s) according to the Local Rules and the Federal Rules of Criminal Procedure, including any supplemental discovery if additional materials are obtained.

III. Timing of Additional Discovery Requests.

The defendant is still in the process of reviewing the initial discovery. He anticipates being able to make requests for additional discovery (if there are any) within 60 days.

IV. Protective Orders.

At this time, the parties are not seeking any protective orders to prevent the disclosure or dissemination of sensitive information concerning victims, witnesses, defendants, or law enforcement sources or techniques. The parties reserve the right to seek such orders in the future, should the need arise.

V. Pretrial Motions Under FRCP 12(b).

The defendant requires an additional 60 days to determine whether he will file any motions under Fed. R. Crim. P. 12(b).

VI. Timing of Expert Disclosures.

The parties propose that the government's expert disclosures, if any, be due 45 days before trial and that the defendant's expert disclosures, if any, be due 21 days before trial.

VII. Defenses of Insanity, Public Authority, or Alibi.

The defendant will file notice in accordance with the schedule for pretrial motions for any defenses of insanity, public authority, or alibi, as required by Fed. R. Crim. P. 12.2-12.3.

VIII. Speedy Trial Calculations.

The parties agree that the time between December 18, 2024 and the next status conference should be excluded because the defendant is continuing to review discovery. This period, therefore, constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," 18 U.S.C. § 3161(h)(7)(B)(iv), and the parties request that this

Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

IX. Status of Plea Discussions and Length of Trial.

The parties are currently unable to estimate the length of any trial.

X. Timing of Further Status Conferences.

The parties request that the December 18, 2024 status conference be cancelled, and that the Court schedule an interim status conference at a time convenient for the Court in approximately 60 days.

Respectfully submitted,

JOSHUA S. LEVY
United States Attorney

By: /s/ Timothy H. Kistner
Timothy Kistner
Laura Kaplan
Assistant U.S. Attorneys

Dated: December 11, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Timothy H. Kistner

Timothy H. Kistner
Assistant U.S. Attorneys

Dated: December 11, 2024